

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

**FILED**

AUG 9 2019

UNITED STATES OF AMERICA

v.

TYRONE ALEXANDER TAYLOR (01)  
JOYDETH ROBINSON (02)

CLERK U.S. DISTRICT COURT

No. 4:19-mj-639 By: Deputy

**CRIMINAL COMPLAINT**

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about August 9, 2019, the defendants, **Tyrone Alexander Taylor** and **Joydeth Robinson**, in the Northern District of Texas, knowingly possessed matter, specifically one (1) black Western Digital external hard drive, which contains any visual depiction that was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer, the production of such visual depiction involved the use of a prepubescent minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

Specifically, the hard drive contained a file, "ZomboMeme 07122016014335.jpg" which is a visual depiction of an adult Caucasian woman's mouth on the penis of a prepubescent male with the caption, "I will suck him wherever...whenever."

In violation of 18 U.S.C. § 2252(a)(4)(B) and § 2.

I further state I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts gathered by me through my own investigation:

**INTRODUCTION**

1. I am currently a Special Agent of the Federal Bureau of Investigation (FBI) since April 2004, and I am currently assigned to the Dallas Division.

2. I am currently assigned to a Child Exploitation Task Force, wherein my duties and responsibilities include investigating criminal violations relating to the sexual exploitation of children (SEOC). I have investigated SEOC violations since 2004 and have gained expertise in these types of investigations through training in seminars, classes, and my everyday work. In addition, I have received specialized training in the investigation and enforcement of federal child pornography laws in which computers are used as the means for producing, transmitting, collecting and storing child pornography.

3. This affidavit sets forth facts and suggest reasonable inferences from those facts, establishing that there is probable cause to believe that on or about August 9, 2019, in the Northern District of Texas, **Tyrone Alexander Taylor** and **Joydeth Robinson** committed the offense of Possession of Visual Depictions of Minors engaged in Sexually Explicit Conduct, in violation of 18 U.S.C. § 2252(a)(4)(B).

4. The information contained in this affidavit is from my personal knowledge of the described investigation and from information obtained from other law enforcement agents.

#### OVERVIEW OF INVESTIGATION

5. On August 5, 2019, I met with a technician for a data recovery business that had reported discovery of child pornography on a hard drive submitted by a customer requesting data recovery. After meeting with the business representative and reviewing an image that depicted child pornography, I seized the hard drive and other associated drives and brought them to the FBI office located in Dallas, Texas.

6. A search warrant was obtained to conduct a forensic review of the hard drive. As a result of the analysis, I observed the following:

- a. In a folder labeled "Shannon meme" is the file "**ZomboMeme** 07122016014335.jpg" which depicts an adult Caucasian woman performing oral sex on the penis of a prepubescent male. Text at the bottom of the image reads "I WILL SUCK HIM WHEREVER... WHENEVER".
- b. In a folder labeled "fer" is file "20170109\_180008.jpg" which depicts **Taylor** wearing a white sleeveless undershirt lying on a bed with his pants down. A girl approximately 11 years of age wearing an orange shirt is seen holding a cell phone and placing her tongue on the erect penis of the adult male. The adult male is looking at the camera and smiling.
- c. In the folders named "joyxx", "joysh", and "jo&shan" were files depicting the same adult female, **Robinson**. File "IMG-20180529-WA0013.jpg" depicts the woman believed to be **Robinson** performing oral sex on the vagina of a prepubescent female. File "IMG-20151128-WA0022.jpg" depicts the woman believed to be **Robinson** lying nude on a bed with two nude prepubescent females. One prepubescent female's vagina is visible and her hand is on **Robinson's** breast. The text "Love Daddy" was edited on the image as was the text "Be Mine" and "True Love", both written in heart graphics. These files both have the letters "WA" written in the file name.

7. I know from my training and experience that the chat and media sharing application Whatsapp will commonly edit names of files which are transmitted through its services and will often add the letters "WA" to those media files. I also know that Whatsapp is a common and popular cell phone application in Central America and is, based on the search of the hard drive, an app used by **Taylor**.

8. An FBI analyst obtained a marriage certificate from Costa Rica in which **Taylor** married a woman named **Robinson**. Several thousand pictures and videos of **Robinson** are present in the hard drive folders with file dates ranging from January 2014 to June 2019. Images and videos of **Robinson** having sex with **Taylor** and Shannon Nichols are also present. Additionally, the data recovery business that was repairing **Taylor's** hard drive also recovered a document in which **Robinson** requested an immigrant visa to the United States in 2018.

9. On August 8, 2019, a search warrant for **Taylor** and **Robinson's** residence at [redacted] Briaroaks in Fort Worth was obtained and a search was conducted by FBI agents on August 9, 2019. Found during the search of the home was a black Western Digital Elements external hard drive bearing serial number WXG1EB869KM1. The words "Product of Malaysia" are printed on the label. On this hard drive in a folder labeled "Shannon meme" is the file "**ZomboMeme 07122016014335.jpg**" which depicts an adult Caucasian woman's mouth on the penis of a prepubescent minor male. Text at the bottom of the image reads "I WILL SUCK HIM WHEREVER... WHENEVER."

10. After providing **Taylor** with his Miranda warnings, **Taylor** agreed to be interviewed. **Taylor** stated that his wife **Joydeth Robinson** moved to their Fort Worth

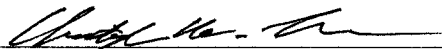
address approximately three months ago from Costa Rica; **Taylor** moved into the home last year. **Taylor** admitted to having files depicting the sexual exploitation of children on the black external memory device in the home. Before moving from Costa Rica, **Taylor** said he and his wife took all the files off of three broken computers and put them on the black external memory device to bring to the United States. He stated these files are also on a broken hard drive which he took to a local company to get repaired in June. **Taylor** was shown the “**ZomboMeme 07122016014335.jpg**” file and recognized the image. He stated the woman in the image is Nichols. The child depicted in the image has also been identified as a real minor.

11. Both defendants knowingly possessed in their home in Fort Worth the Western Digital Elements external hard drive containing visual depictions of minors engaged in sexually explicit conduct. The hard drive was manufactured in Malaysia, which means the images were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce.

*[Continued on next page]*

CONCLUSION

12. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that on or about August 9, 2019, in the Northern District of Texas, **Tyrone Alexander Taylor** and **Joydeth Robinson** committed the offense of Possession of visual depictions of minors engaged in sexually explicit conduct, in violation of 18 U.S.C. §2252(a)(4)(B) and § 2.

  
Special Agent Christopher Thompson  
Federal Bureau of Investigation

Subscribed and sworn before me this 9<sup>th</sup> day of August 2019 in Fort Worth,  
Texas at 3:00 p.m.

  
JEFFREY L. CURETON  
United States Magistrate Judge